

AMENDMENTS TO THE DRAWINGS

Kindly replace original drawing sheets 4/21 (including Figures 3A and 3B), 14/21 (including Figure 9A), 15/21 (including Figure 9B), 16/21 (including Figure 9C) and 19/21 (including Figure 12) with Replacement Sheets 4/21, 14/21, 15/21, 16/21 and 19/21 submitted herewith.

REMARKS

I. Summary of the Office Action and this Reply

Claims 1-12 are pending the in application. Claims 6-11 have been withdrawn from consideration. The Examiner has rejected claims 1, 4, 5 and 12 stand rejected under 35 U.S.C. §102(e), asserting that such claims are anticipated by U.S. Patent No. 6,439,918 to Togami et al. ("Togami"). The Examiner has rejected claims 2 and 3 under 35 U.S.C. §103(a), asserting that such claims are obvious in view of Togami. Various objections have been made to the drawings and claims.

In this Reply, claims 3-5 are amended for clarity and/or to obviate the Examiner's objections; new claim 13 is added.

Amended drawings are filed herewith. More specifically, Replacement Sheet 4/21 has been amended to include reference numerals 82a and 82b for reentrant surfaces, and Replacement Sheets 14/21, 15/21, 16/21 and 19/21 have been amended to include revised cross-hatching in response to the Examiner's objections on page 2 of the Action. Further, the specification has been amended to include reference numerals 82a and 82b. No new matter is entered.

II. Response to 102 Rejections

Claims 1, 4, 5 and 12 stand rejected over Togami. A rejection under 35 U.S.C. § 102 is proper only if each and every element of the claim is found in a single prior art reference. MPEP § 2131.

Claim 1

Independent claim 1 is directed to a de-latch mechanism for a pluggable module. In addition to "a lever pivotable about a pivot pin . . . and a cam provided on said pivot pin", the mechanism includes "an actuator slidable in a longitudinal direction." The pivot pin "has an axis transverse to the longitudinal direction." Further, claim 1 recites that "pivoting of said lever about said pivot pin causes said cam surface to impinge upon said actuator to impart sliding motion thereto."

Contrary to the Examiner's assertion on page 4 of the Action, Togami neither teaches nor suggests (1) "an actuator slidable in a longitudinal direction" or (2) "a lever pivotable about a pivot pin" such that "pivoting of said lever about said pivot pin causes said cam surface to impinge upon said actuator to impart sliding motion thereto."

Instead, Togami discloses a module 100 having a bail 108 "operatively secured to the module 100 by way of an overlying pivot block, designated generally at 110." Col. 6, lines 31-33. "Rotation of the bail 108 causes the cam portion 107 [of the bail 108] to operatively engage a cam follower surface 119 formed on the pivot block 110" Col. 6, lines 47-50. "FIGS. 1 and 1A illustrate how the pivot block 110 also includes a pivot arm 112 disposed along a pivot axis of the block 110. When mounted . . . each end of the pivot arm 112 is rotatably held within pivot points 122 and 123 that are each formed on the top surface of the connector portion 106." Col. 6, lines 51-56.

In operation, the "bail 108 is rotated upwardly, as is indicated by the directional arrow in FIG. 3A, to place the latch mechanism 101 into an "unlatched" position, shown in FIG. 3B. When the bail 108 is rotated upwardly, . . . [t]he force of the cam 107 against the cam follower surface 119 provided on the pivot block . . . causes the pivot block 110 to pivot in the opposite direction about axis 112. This lowers the pivot lock

pin 111 so that it is disengaged from the notch 213 formed within the host port 200."

Col. 8, lines 4-19.

Accordingly, Togami discloses a pivotable bail-type lever that is pivotable to cause a pivot block to pivot about its axis, and thus unlatch. Thus, Togami relies on pivoting motion of a "pivot block" to de-latch, whereas the claimed invention relies upon sliding motion of an actuator to de-latch. No portion of Togami's mechanism slides in a longitudinal direction as a result of pivoting of a lever. Togami's pivot block 110 capable of pivoting is not "an actuator slidable in a longitudinal direction."

Further, the pivot block 110 cannot slide in a longitudinal direction because its pivot arm 112 is rotatably held within pivot points 122 and 123 that are each formed on the top surface of the connector portion 106. Col. 6, lines 51-56. These pivot points would interfere with, and thus prevent, any longitudinal translation of the pivot block. See Figure 1. Further, there cannot be motivation to modify the mechanism of Togami to arrive at the claimed invention because doing so would (1) change the principle of operation of the Togami device from one relying upon pivoting motion to another relying upon sliding motion, and (2) render the device inoperable for its intended purpose, and (3) would render the pivot points 122, 123 useless and/or inoperable for their intended purpose.

For at least these reasons, reconsideration and withdrawal of the rejection of claim 1 are requested respectfully.

Claims 4 and 5

Claims 4 and 5 depend from claim 1 and are likewise patentable. Additionally, claim 4 has been amended to recite that the guide rails and latch tabs cooperate to

allow relative translational motion between them. This is neither taught nor suggested by the cited art. Claim 5 depends from claim 4.

For at least these additional reasons, reconsideration and withdrawal of the rejections of claims 4 and 5 are requested respectfully.

Claim 12

Independent claim 12 is directed to a pluggable module assembly that includes a pluggable module having "a housing . . . defining a slot extending adjacent the latching member; an actuator mounted in the slot and slidable in a longitudinal direction; a lever pivotable about a pivot pin having an axis transverse to the longitudinal direction; and a cam provided on said pivot pin, said cam having a curved cam surface." Further, claim 12 recites that "pivoting of said lever about said axis causes said cam surface to impinge upon said actuator to impart sliding motion thereto to cause said latch tab to release said latch member." Thus, according to claim 12, pivoting of the lever causes sliding of the actuator, and such sliding causes a latch tab to release a latch member. This is neither taught nor suggested by Togami.

Accordingly, claim 12 includes recitations similar to those of claim 1 and is likewise patentable.

Reconsideration and withdrawal of the rejection of claim 1 are requested respectfully.

III. Response to 103 Rejections

Claims 2 and 3 stand rejected under Section 103. Claims 2 and 3 depend from allowable claim 1, and thus are likewise allowable.

Reconsideration and withdrawal of the rejection of claims 2 and 3 are requested respectfully.

IV. New Claim 13

New independent claim 13 is directed to a de-latch mechanism for a pluggable module that includes "an actuator translatable in a linear direction." Further claim 13 recites that "pivoting of said lever about said pivot pin causes said cam surface to impinge upon said actuator to impart linear motion thereto." This is neither taught nor suggested by Togami, as discussed above. Togami teaches only pivoting of a pivot block in response to pivoting of a bail, as discussed above.

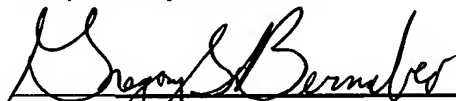
Allowance of claim 13 is requested respectfully.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe claims 1-5, 12 and 13 to be patentable and the application in condition for allowance, and request respectfully issuance of a Notice of Allowance. If any issues remain, the undersigned requests a telephone interview prior to the issuance of an action.

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Respectfully submitted,



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